

I propose that Part 91.213: Inoperative Instruments and Equipment, paragraph (a) (2) should be amended by adding the following at the end: "However, no letter of authorization shall be required for use of the approved Minimum Equipment List for operation under Part 91."

This change would allow operation of a turbine powered aircraft under Part 91 using the FAA approved Master Minimum Equipment List (MMEL) for that type of aircraft as the 'approved Minimum Equipment List' without obtaining a letter of authorization (LOA) from the FSDO.

The reasons for this proposal are as follows:

(1) Increasing numbers of small, multi-engine and single-engine turboprop and turbojet aircraft are becoming available and often are operated under Part 91. Each one is required to obtain a LOA to operate legally with with even the most insignificant inoperative equipment. For example, an inoperative passenger convenience item such as a reading light prevents operation, even if no passengers are being carried.

(2) The operators of turbine powered aircraft are excluded from the provisions of Part 91.213(d) which allow operation of aircraft with certain inoperative instruments and equipment without an MEL.

(3) The FAA has developed, approved and published MMEL's for many types of turbine powered aircraft.

(4) The requirement of authorization for use an approved MEL for Part 91 operations is the same as for Part 121, 125 or 135 (see Part 91.213 (c)). This is unnecessary and inappropriate for Part 91 operations of small turbine powered aircraft.

(5) The letter of authority issued by the FAA FSDO which permits each operator to use the FAA's MMEL as an MEL for the aircraft, is a standard form letter. If there are any circumstances in which the FAA is of the opinion that use of the FAA MMEL by an operator under Part 91 might compromise safety, this should be addressed in a limitation in the rules, instead of requiring each operator to obtain a LOA.